

# EXHIBIT 20

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; et al.,

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND  
COMMUNITY SERVICE, OPERATING AS  
AMERICORPS; et al.,

Defendants.

C.A. No. 1:25-cv-01363-DLB

**DECLARATION OF ALEXANDER POPE**

Pursuant to 28 U.S.C. § 1746, I, Alexander Pope IV, hereby declare as follows:

1. I am a resident of the State of Maryland. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by Salisbury University as Associate Professor of Education and Director of the Institute for Public Affairs and Civic Engagement.

3. Salisbury University is responsible for offering excellent, affordable education in undergraduate liberal arts, sciences, business, nursing, health sciences, social work, and education and applied master's and doctoral programs. The University's highest purpose is to empower its students with the knowledge, skills, and core values that contribute to active citizenship, gainful employment, and life-long learning in a democratic society and interdependent world.

4. As Associate Professor of Education and Director of the Institute for Public Affairs and Civic Engagement, I am the primary investigator and project director for the ShoreCorps program at Salisbury University. ShoreCorps is the name of the program that our University gives to our use of AmeriCorps funding.

5. I have served as professor of education since 2013, Director of the Institute for Public Affairs and Civic Engagement since 2014, and project director of ShoreCorps since 2016.

6. ShoreCorps' mission is to strengthen the capacity of community organizations, to improve the lives of vulnerable populations, and to foster civic engagement through service and volunteerism. We partner with community-based organizations, schools, governmental agencies, non-profits, and faith-based organizations to address critical educational, recreational, social and cultural needs. Our AmeriCorps members engage in direct service to build the capacities of the organizations they serve. Members are compensated based on their service commitment. Compensation primarily comes in one of two areas. First are bi-weekly stipends paid through Salisbury University using funds from the federal AmeriCorps program and partner site match fees (fees paid for by organizations that utilize AmeriCorps members). Second are education awards paid through the federal AmeriCorps program via the National Service Trust; education awards provide funding to help pay for federal student loans and/or future educational expenses.

7. Members who commit to a full-time, one-year commitment of 1,700 hours of service (approximately 40 hours per week) can receive: a bi-weekly living allowance of \$1,062 (over 48 weeks of active service); an education award of \$7,395; health insurance, if eligible; and child care reimbursements, if eligible. Members who commit to a half-time, one-year commitment of 900 hours of service (approximately 20 hours per week) receive a bi-weekly living allowance

of \$562 and an education award of \$3,697. Members who commit to a minimum-time, one-year commitment of 300 hours of service receive an education award of \$1,565.

8. In addition to funding, AmeriCorps provides the following programs and services:

a. Trainings in support of AmeriCorps “members,” including “Life After AmeriCorps.” In addition, AmeriCorps resources help to assess best practices, including through the Evidence Exchange and Evidence Webinars used to improve data collection and analysis. These resources are integral to the ShoreCorps program and to measure the success of ShoreCorps building capacity at partner sites.

b. Member technical support through the AmeriCorps national helpdesk. The AmeriCorps technical support is integral to our program’s operation, because it enables our members to properly record their service hours, receive educational awards, and access health benefits and other employment benefits.

c. Training in support of efficient and effective management of AmeriCorps programs, including how to conduct national and state criminal history checks, ensure compliance with such checks, and utilize best practices for recruitment, member experience, and assessment. Without such training, we would face significant challenges in compliance with mandatory background checks, and in supporting members during their service.

9. Salisbury University has received AmeriCorps funding for over 30 years. The ShoreCorps program was awarded \$490,538 in federal funding for the current service year via “Formula Funds” provided through the Maryland Governor’s Office on Service and Volunteerism. This funding is critical to supporting our operations in multiple ways:

a. Funding provides salaries and stipends to the full-time staff needed to support the ShoreCorps program, and compensation to members, among other necessary costs to operate the program. This service year (August 2024-August 2025) ShoreCorps enrolled 178 AmeriCorps members. As of April 2025, these members have collectively provided approximately 53,000 hours of service at 57 government and nonprofit agencies across the rural Eastern Shore of Maryland. Through those agencies, AmeriCorps members have managed 1,164 volunteers, provided services for 517 youths, and provided services for 1,557 adults.

b. ShoreCorps members will provide an expected 23,000 additional hours of service in those agencies by the end of the current grant year on August 14, 2025. Using accepted rates of valuing volunteer hours at approximately \$33 per hour of service, this comprises \$2,545,240 of support to these agencies. The most recently available data on nonprofits in the region, compiled by the Community Foundation of the Eastern Shore in 2019, reports that at least 1 in 3 residents of the area receive support from nonprofits, and that “demand for the programs and services delivered by nonprofits are on the increase . . . nonprofits report being less able to meet the demand for their services - 64% report being able to meet service demand in 2018 versus 74% in 2017.”

c. To take one example of the activities we support, the Presidential Citizen Scholars program consists entirely of students enrolled in ShoreCorps. Here, members developed a partnership with Wicomico Public Schools and Aetna Better Health to assemble and distribute 1,000 discreet menstrual product bags for a pilot program at Wicomico Middle School, to provide support to students who might not otherwise have it, while creating plans to roll out these resources out to the entire school system in Wicomico County. Our Presidential Citizen Scholars also partnered with Wicomico County Parks and Recreation to launch and staff—via Salisbury volunteers—an afterschool NFL Flag football program. Our Scholars further collected and

presented data on transportation access, resulting in a new city bus stop in a historically underserved area of Salisbury. And they piloted a National Association for Children of Addiction (NACOA) curriculum designed to help youth impacted by drug abuse at the Boys & Girls Club of Wicomico County.

d. Another major program supported by ShoreCorps is the TRIO Program at Salisbury University. AmeriCorps members support the TRIO program's mentoring team, known as the Student Involvement Ambassadors Team (SIAT), and the infrastructure team, known as the Communications & Social Media (CSM) Team. AmeriCorps members support TRIO by recruiting University students who may need additional support, such as first-generation, low-income, and disabled students; mentoring those students by maintaining regular communication through weekly individualized text messages, emails, and phone calls; hosting workshops on academic transitions and stress management; and, managing essential department projects such as technology inventory, recruitment efforts, office and storage organization, photography management, documentation checks, Giving Day coordination, and end-of-year awards.

e. As a further program, Sammy's Stash Secondhand Shop is primarily run by four AmeriCorps student workers with supervision/coordination from the SU Recycling Coordinator. Sammy's Stash is a repository for professional clothing that can be acquired for students, free of charge, so students can use them for activities such as interviews and professional events, when they otherwise would not be able to afford such attire. This year over four hundred items have been checked out for student-use, and the program has recirculated 1,700 pounds of free, gently used items to the University community.

f. As a final example of programs supported by ShoreCorps, Salisbury Urban Ministries is a faith-oriented non-profit organization focused on developing and implementing

programs that serve the needs of materially impoverished people. Our partnership with Salisbury Urban Ministries is an inspiring success story whereby our ShoreCorps members allowed the group to grow operations to the point that the organization became fully self-sustaining, eventually hiring their last AmeriCorps member to a formal staff role after their 4-year service term. During their service, this member used their education award money to complete an associate's degree in early childhood education to help better position themselves for the new role of lead education director at the center. Several other former partner sites no longer require ShoreCorps support because they hired an AmeriCorps member to a permanent position. These groups include Beach to Bays Heritage Area, His Hope Ministries Homelessness Department, and the Disabilities Resources Center at Salisbury University.

g. These examples highlight the unique and critical role that ShoreCorps plays in allowing Salisbury University students – and the university as a whole – to apply academic concepts and service programs towards real-world issues.

10. Salisbury University itself also relies on AmeriCorps funding in several ways.

a. First, AmeriCorps funds are needed to support full-time staff that operate the ShoreCorps program, and the ShoreCorps members that staff campus programs. Specifically, four campus programs are staffed via AmeriCorps members: Food for the Flock, the campus food pantry, is staffed by six members, and provides services to University students who cannot reliably afford food; TRIO, the office of student support services, is staffed by four members; Sammy's Stash is staffed by four members; and the Presidential Citizen Scholars Program is staffed by 14 members.

d. Second, Salisbury University relies on the education awards provided at the conclusion of member service to support student tuition. In 2024, ShoreCorps members put \$118,061 of their education awards toward Salisbury University tuition.

e. Third, Salisbury University relies on AmeriCorps funding to expand our presence in and partnership with the community. That is, our University places members with organizations in the area, who then frequently host other Salisbury University students as interns. Salisbury University also leverages AmeriCorps member service as a means of positive marketing across Maryland's Eastern Shore, thereby recruiting potential students.

f. Fourth and finally, the ShoreCorps program is a key element of our University's mission and strategic plan. Salisbury University is a public regional comprehensive university. Regional public comprehensives generally began as teacher training schools in many communities across the country and have evolved to meet the distinctive education/workforce needs of each of their regions, and enroll a disproportionately higher percentage of students who may be low-income, first-generation, minorities, working adults, and/or veterans.

g. As a public regional comprehensive university, Salisbury University feels a keen responsibility to the people of Maryland's Eastern Shore. "Deepening engagement with our community" is one of five strategic goals at Salisbury University, and the current Strategic Plan makes deep commitments to civic and community engagement, commitments that are achieved in large part through ShoreCorps. Indeed, the ShoreCorps program is the largest AmeriCorps program in Maryland, and its success has been recognized through several awards, including the American Association of State Colleges and Universities' American Democracy Project's Barbara Burch Award for Faculty Leadership in Civic Engagement given to the ShoreCorps director in 2022, We the People Award for Excellence and Innovation in Civic Learning and Community



Engagement given to ShoreCorps' host department PACE in 2023, and Spirit of Democracy Award for individual staff commitment to civic engagement given to the ShoreCorps assistant director in 2024.

11. Statistics from the Bureau of Labor Statistics, Department of Planning, and State Department of Education highlight the important role that AmeriCorps service plays in our part of Maryland. Most counties on the Eastern Shore report rates higher than the Maryland average in unemployment, overall poverty, free and reduced meal rates, and school-age youth in poverty. Per the CDC, most counties on the Eastern Shore are more vulnerable than 90% of counties in the United States with respect to housing type/transportation, minority status/language, and household composition. AmeriCorps provides resources and supports to help citizens of an under-resourced area of rural America meet the needs of their fellow citizens. AmeriCorps funding also covers two full-time staff who oversee, deliver, and assess the program.

12. Salisbury University has submitted a proposal for \$1,002,199 in AmeriCorps funding for next service year (beginning August 15, 2025), matched by \$436,852 in Salisbury University funding (comprised of funds from the University and partner organizations). The increased request represents continued and growing need in the community for the support that AmeriCorps facilitates. The University has already received applications from sites for 31 members; 17 of those positions have already been filled by sites. These primarily include sites focused on youth mentorship, education, veteran and homeless supports, and general social services. Eleven of those positions would be filled by members returning to their service sites for a second year.

13. In the next month, the University is scheduled to receive reimbursements of \$41,126 under our current Federal AmeriCorps awards for expenses incurred in March 2025.

14. The University is expecting to receive additional disbursements of approximately \$214,000 through the end of the grant year on August 14, 2025. If we do not receive such disbursements/reimbursements, or if there are delays or pauses in such reimbursements, it will adversely affect ShoreCorps members' service, potentially including effective termination, as they will no longer receive the stipends they have been promised and contracted for as ShoreCorps members. In addition, Salisbury University employees who are funding by the AmeriCorps grant will have their positions threatened or eliminated.

15. On April 16, 2025, the University received notice from the Maryland Governor's Office on Service and Volunteerism that AmeriCorps headquarters staffing will be reduced by at least fifty percent and may also include a pause or cancellation of funding. Such staffing reductions are likely to result in delays or cancellations of expected disbursements/reimbursements.

16. Harm resulting from elimination or delay in delivery of programs, studies, surveys, or certifications would include fewer services being provided to the community or cancellation of these services, with no recourse to filling those needs in other ways. This would severely harm ShoreCorps and Salisbury University.

17. A Termination or long-term pause of current funding would effectively end ShoreCorps programming. This includes ending stipends, potentially withholding or delaying education awards promised to members in exchange for their term of service, and ending ongoing training supports. Ending stipends and/or limiting education awards would cause members to exit the program, ceasing their service at partner sites that include Salisbury University. Ending the training programs that support members during their terms of service will interrupt or end members' professional and educational development. Similar harms are expected should

applications for next year's service year be delayed, as current and future members and sites are making decisions about their FY 25-26 budgets.

18. Termination or pause of promised funding will cause additional harm for Salisbury University. Lack of funds would result in termination of ShoreCorps staff and members serving at the University. The loss of ShoreCorps staff would mean the immediate cessation of supports for all members in the program, as well as the inability of the University to respond to inquiries or other requests about the program. Loss of members or their time would in turn likely result in the closure of University programs including Food for the Flock (campus food pantry), TRIO (student mentorship), Sammy's Stash (professional clothing closet), and the Presidential Citizen Scholars (student partnership with municipal governments). Similar harms are expected should applications for next year's service year be delayed, as current and future members and sites are making decisions about their FY 25-26 budgets.

19. A termination or pause in funding, or continued reductions in federal program staff would also harm Salisbury University by limiting the education awards that students can put towards tuition at Salisbury.

20. Salisbury University will additionally be harmed through unexpected limitations on marketing and recruitment assistance that is an effect of ShoreCorps' long history of providing impactful service across Maryland's Eastern Shore. A commitment to our surrounding community is a cornerstone of Salisbury University's mission. Losing key supports for that mission in the middle of a service year will result in harm to the University writ large.

21. On Saturday, April 26, 2025, Salisbury University received notice from the Maryland Governor's Office on Service and Volunteerism that "more than 1,000 programs nationally had their grants terminated and thousands of members were required to cease their

service immediately. As of now, we have not received notifications that your program's grant was impacted." Despite this notification that ShoreCorps was not one of the cut programs, ShoreCorps has been harmed by the recent changes to AmeriCorps.

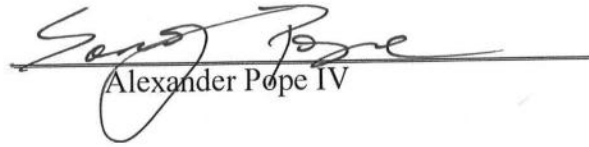
22. We have received no notification or guidance from AmeriCorps, including regarding our open application for service year 2025-2026 funding. Specifically, in January of this year we submitted our proposal for \$1,002,199 in competitive grant funding. Normally, AmeriCorps provides an initial decision on such applications in mid-April, which are communicated to programs like ours. However, this year we have not received an initial decision on our application.

23. If our competitive grant application is not granted, we can instead apply for a formula-funded grant, as selected by Maryland. But because we have not received an initial decision on our competitive application, and have not received any guidance or explanation as to any next steps, we have been unable to prepare a possible grant application for formula funds.

24. As a consequence, ShoreCorps is unable to fully prepare for operation next year. Such uncertainty, in conjunction with the fact that AmeriCorps has been dismantled in many important ways, is creating significant difficulty in recruiting new or retaining current members, retaining full-time staff, and partnering with sites to take on AmeriCorps members. Without any communication as to whether, or when, we may be funded for next year, our program's operation is significantly impeded.

25. The America's Service Commissions annual conference that ShoreCorps staff had registered for was immediately and indefinitely postponed. In sum ShoreCorps has seen reductions in overall support for ongoing grant operations and delays in information regarding future funding.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on May 5, 2025, in Salisbury, MD.

  
Alexander Pope IV